

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

ROBERT T. BROCKMAN, Plaintiff,)	
)	
)	Case No. 22-cv-00202
v.)	
)	
UNITED STATES OF AMERICA)	
Defendant.)	

JOINT STATUS REPORT

Pursuant to the Court's Order, Dkt. No. 43, the parties file this joint status report.

1. Plaintiff Robert T. Brockman brought this above-referenced action pursuant to 26 U.S.C. § 7429(b) seeking review of a jeopardy assessment and jeopardy levy.
2. The following motions are outstanding and ripe for determination:
 - **Dkt. No. 10:** Plaintiff's Motion for Determination on Complaint of Judicial Review and Abatement of Jeopardy Assessment and Jeopardy Levy Pursuant to 26 U.S.C. § 7429 – (Dkt. No. 21: United States' Opposition, Dkt. No. 34: United States' Notice of Correction, Dkt. No. 35: Plaintiff's Reply);
 - **Dkt. No. 17:** United States' Motion to Extend Word limits – (Dkt. No. 19 Plaintiff's Opposition, Dkt. No. 20: United States' Reply); and
 - **Dkt. No. 37:** Plaintiff's Motion for Leave to File a Supplemental Memorandum in Support of Motion for Determination on Complaint (Dkt. No. 38: Plaintiff's Supplemental Memorandum, Dkt. No. 39: United States' Response in Opposition, Dkt. No. 41: Plaintiff's Reply).
3. The last filing in the case was Plaintiff's letter to the Court filed on March 29, 2022, Dkt. No. 42.
4. No bond or advance payment has been made to the IRS by Robert Brockman, the AEBC Trust, or any other person or entity to stay collection of Robert Brockman's tax

liabilities at issue in this case. The most recent communication regarding posting a bond or staying collection of the jeopardy assessments against Robert Brockman at issue in this case occurred on April 20, 2022.

5. There has been no settlement of Robert Brockman's tax liabilities or of this case.

6. Mr. Brockman's counsel represents that Mr. Brockman was hospitalized in late April – early May and was released into home hospice care.

Dated: June 17, 2022

DAVID A. HUBBERT
Deputy Assistant Attorney General

By:

/s/ Herbert W. Linder
HERBERT W. LINDER
Ohio Bar No. 0065446
JONATHAN L. BLACKER
State Bar No. 00796215
JOHN P. NASTA, Jr.
SDTX No. 3735958
Attorneys, Tax Division
Department of Justice
717 N. Harwood, Suite 400
Dallas, Texas 75201
(214) 880-9754
(214) 880-9774 (facsimile)
Herbert.W.Linder@usdoj.gov
Jonathan.blacker2@usdoj.gov
John.nasta@usdoj.gov

ATTORNEYS FOR UNITED STATES

/s/ Jason S. Varnado

Jason S. Varnado
Texas Bar No. 24034722
SDTX Ad. ID No. 32166
Email: jvarnado@jonesday.com
Julia N. Camp
Texas Bar No. 24123598
SDTX Ad. ID No. 3688104
Email: juliacamp@jonesday.com
JONES DAY
717 Texas, Suite 3300
Houston, TX 77002
Telephone: 832-239-3939
Facsimile: 832-239-3600

Kathryn Keneally (*Admitted Pro Hac Vice*)
New York Bar No. 1866250
Email: kkeneally@jonesday.com
Frank J. Jackson (*Admitted Pro Hac Vice*)
New York Bar No. 2870251
Email: fjackson@jonesday.com
Michael J. Scarduzio (*Admitted Pro Hac Vice*)
New York Bar No. 5147186
Email: mscarduzio@jonesday.com
Anthony J. DeRiso (*Admitted Pro Hac Vice*)
New York Bar No. 5787312
Email: aderiso@jonesday.com
JONES DAY
250 Vesey Street
New York, NY 10281-1047
Telephone: 212-326-3939
Facsimile: 212-755-7306

Irina K. Bleustein (*Admitted for Pro Hac Vice*)
District of Columbia Bar No. 1044772
Email: ibleustein@jonesday.com
JONES DAY
51 Louisiana Avenue, N.W.
Washington, D.C. 20001-2113
Telephone: 202-879-3450
Facsimile: 202-626-1700

ATTORNEYS FOR PLAINTIFF
ROBERT T. BROCKMAN

CERTIFICATE OF SERVICE

I certify that on June 17, 2022, I filed the foregoing document by electronic means on all parties who have entered an appearance through the Court's ECF system, including the following:

Jason S. Varnado
Julia N. Camp
Kathryn Keneally
Frank J. Jackson
Michael J. Scarduzio
Anthony J. DeRiso
Irina K. Bleustein
JONES DAY
717 Texas, Suite 3300
Houston, Texas 77002
Attorneys for Plaintiff

/s/ John P. Nasta, Jr.
JOHN P. NASTA, JR.
U.S. Department of Justice